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Environmental Quality Board
P. O. Box 8477
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ENVIRONMENTAL QUALITY BOARD

July 24, 2009

Subject: Operator Training Proposed Regulations

Note: The e mail link given for electronic comments does not work

Thank you for the opportunity to comment on these regulations. I am an internationally known specialist in centrifuges and dewatering/thickening of wastewater solids. I am the volunteer author of WEF's Manual of Practice 11 (dewatering chapter), and the EPA manual as well. Some of my income comes from both optimizing the centrifuge at water and wastewater treatment plants, and teaching the operators to do the optimization themselves. It is a specialized, technically intensive course. I cover the US and Canada, and so only give one or two courses in Pennsylvania. Presently, it costs very little for me to offer my customers certification credit. Certification credit is very important to the municipality who hires me. As an example of my pricing, in 2008, to drive from Philadelphia to Pottstown, and give a 6.5 hour course which I adjust somewhat to match the equipment and processes the particular plant has. I charge about \$1,500 plus \$15 for each copy of the 175 page school book. For 15 operators at this plant, it amounts to \$100/attende.

If I understand correctly, the cost in the future would be:

Training provider approval	\$90
Brief course approval	\$115
Course roster for 15	\$15
1 examination	\$400
	<u>\$620.....\$41.33/student versus no fee now</u>
Cost to do work	\$1,500
Total cost to WWTP	\$2,120 A 40% increase!

Suppose I had 20 attendees at ten school sessions

Training provider approval	\$90
Brief course approval	\$115
Course roster for 200	\$200
1 examination	\$700
	<u>\$1,105.....\$5.53/student</u>

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So the DEP fees to do a course at one WWTP are \$620, the cost to do ten times that is less than half that.

The effect of your regulation will be to drive out small specialized training providers, leaving the field to the larger ones. My sense is that this is not a good policy. When it comes to technical training, most plants do not have co-generators, centrifuges, screw presses, anaerobic digesters,

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incinerators, so training for these specialties is not likely to be addressed by mass market courses, or if so, in a vague general way.

The new policy strongly discourages smaller more specific training, and virtually mandates broad based, generalized training.

The new policy has this: **Note: To insure no person is covering a large percentage of the total costs, a maximum fee of \$10,000 is proposed. This fee structure results in 37% of the program costs covered by operators, 53% by systems and 10% by the training and examination providers.**

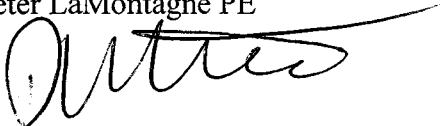
In the context of the note, I presume the word 'persons' really means corporations and municipalities. Why, exactly, should the large municipalities and large corporation's fees be capped? How are their costs different from smaller municipalities and corporations? Should property taxes be capped so that very large property owners do not pay too much? What you are doing is transferring the costs from the very large training providers and municipalities onto the smaller ones. This makes it harder for small towns to run their plants, raises the barriers to entry by new providers, and drives out the small training providers. It is similar to giving major tax incentives to a Box store that enables them to more easily drive out small businesses.

It seems obvious to me that the total costs should be divided by the number of students, and that should be what the training provider pays.

The cost is a zero sum. At the end of the day, all of the costs are being born by the Wastewater plants. Add costs to the training providers or the individual operators and those costs too will end up being paid by the WWTP.

Thank you for the opportunity to comment on this. In general I am a strong advocate for certification of operators and continuing education.

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One Page Summary of comments by Peter LaMontagne PE

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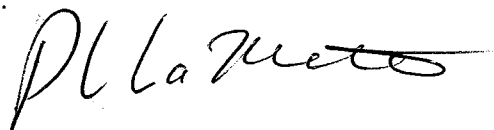
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